REMARKS

Claims 1, 19, 28-30, 32 and 34-36 have been amended. Claims 4 and 21 have been cancelled without prejudice or disclaimer. Support for the amendments may be found throughout the as-filed specification. Applicant believes no new subject matter has been added. Accordingly, claims 1-3, 5-20, and 22-36 are currently pending, of which claims 6, 13, 14, 26, 31 and 33 are withdrawn. Reconsideration and allowance of the present application based on the following remarks are respectfully requested.

Applicant submits that the entry of this Amendment is proper under 37 C.F.R. §1.116, as the claim changes: (a) place the application in condition for allowance for the reasons discussed herein; (b) do not require any further consideration as the claim changes employ limitations from originally-filed dependent claims that should have already been searched; and (c) places the application in better form for an Appeal, should an Appeal be necessary.

Claims 1-4, 7-9, 12, 15-23, 25, 27-30, 32 and 34-36 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2006/0023181 to Novak ("Novak '181") in view of either Japanese Patent Application Publication No JP 10-303114 to Ushida et al. ("Ushida") or Japanese Patent Application Publication No JP 10-340846 to Kudo ("Kudo) or PCT Patent Application Publication No. WO 99/49504 to Fukami et al. ("Fukami"). Applicant traverses.

Claims 1 and 19

As acknowledged in the Office Action, the cited portions of Novak '181 do not disclose or teach a projection which projects out above an upper surface of the substrate table. *See, e.g.,* Figure 2B of Novak '181. Accordingly, the cited portions of Novak '181 do not disclose or teach a barrier configured to collect liquid escaping from the localized area, the barrier surrounding and spaced apart from the substrate and comprising a projection which projects out above an upper surface of the substrate table and a groove recessed into an upper surface of the substrate table, as recited in claim 1

nor disclose or teach collecting liquid escaping from the localized area with a barrier, the barrier surrounding and spaced apart from the substrate and comprising a projection which projects out above an upper surface of the substrate table and a groove recessed into an upper surface of the substrate table, as recited in claim 19.

Further, Applicant submits that the cited portions of either Ushida, Kudo or Fukami fail to overcome the deficiencies of the cited portions of Novak '181. For example, with respect to the cited portions of Ushida and Kudo, Applicant submits that those references are not properly combinable with Novak '181 to teach claims 1 and 19 because neither the cited portions of Ushida nor the cited portions of Kudo are directed to a localized area liquid supply system. Rather, the cited portions of Ushida and Kudo are directed to full wafer immersion systems and accordingly the projection LB of Ushida and the projection of wafer table WT of Kudo serve entirely different purposes. Those projections do not act as a barrier configured to collect liquid escaping from a localized area nor do they collect liquid escaping from a localized area with a barrier. Rather, those projections are designed to contain all the liquid in regular use.

Applicant respectfully submits a person of ordinary skill in the art having regard to the cited portions of Ushida and Kudo would not see any use for the projections in Ushida and Kudo in the system of Novak '181. Novak '181 has a second recovery system 256 to collect liquid that is not captured by Novak '181's first recovery system 254, the second recovery system 256 appearing to be analogously disclosed as drain L in Kudo and the slot 51 of Ushida. Applicant submits that the projections of Ushida and Kudo would be perceived as redundant. Moreover, Applicant submits that the projections of Ushida and Kudo would be perceived as intended for an entirely different and contradictory purpose to Novak '181, namely to maintain a bath of liquid that can extend above and beyond drain L in Kudo and the slot 51 of Ushida.

Applicant also submits that the cited portions of Fukami fail to disclose or teach the deficiencies of the cited portions of Novak '181. For example, Applicant submits that the cited portions of Fukami are silent as to a barrier surrounding and spaced apart from the substrate and comprising a projection which projects out above an upper surface of the substrate table. For example, there is no indication that the "dividing wall" of Fukami

is spaced apart from the substrate, and/or that the "dividing wall" of Fukami projects out above an upper surface of the substrate table.

Additionally, the cited portions of Fukami do not appear to provide any teaching regarding the location or arrangement of its "pipe" (except to state that it is "for recovering liquid from within this dividing wall"). Indeed, the other "pipes" to recover liquid referred to in Fukami appear to be suspended above the substrate, such as pipes for discharge 24a and 29a. Thus, the cited portions of Fukami do not appear to be properly combinable with the cited portions of Novak '181 which discloses an entirely different arrangement, namely a second recovery system 256 in the substrate table.

Claim 28

Applicant submits that the cited portions of Novak '181 and either Ushida, Kudo or Fukami do not teach or disclose a lithographic apparatus comprising, *inter alia*, a substrate table comprising a barrier configured to collect liquid escaping from the localized area, the barrier surrounding and spaced apart from the substrate and positioned radially outwardly of a drainage ditch surrounding an outer peripheral edge of the substrate, as recited in claim 28.

The Office Action appears not to have addressed the claim elements of claim 28. The Office Action refers to the second recovery system 256 of Novak '181 as corresponding to the claimed barrier but, however, does not appear to address a drainage ditch or other barrier surrounding an outer peripheral edge of the substrate relative to which the claimed barrier is positioned radially outwardly. Applicant submits that the cited portions of Novak '181 do not appear to disclose the claimed drainage ditch relative to which the claimed barrier (alleged as corresponding to the secondary recovery system 256 of Novak '181) is positioned radially outwardly.

Further, Applicant submits that the cited portions of either Ushida, Kudo or Fukami fail to overcome the deficiencies of the cited portions of Novak '181. For example, with respect to the cited portions of Ushida and Kudo, Applicant submits that those references are not properly combinable with Novak '181 to teach claim 28 because neither the cited portions of Ushida nor the cited portions of Kudo are directed

to a localized area liquid supply system as discussed above with respect to claims 1 and 19.

Applicant respectfully submits a person of ordinary skill in the art having regard to the cited portions of Ushida and Kudo would not see any use for the projections in Ushida and Kudo in the system of Novak '181. Novak '181 has a second recovery system 256 to collect liquid that is not captured by Novak '181's first recovery system 254, the second recovery system 256 appearing to be analogously disclosed as drain L in Kudo and the slot 51 of Ushida. Applicant submits that the projections of Ushida and Kudo would be perceived as redundant and/or as intended for an entirely different and contradictory purpose to Novak '181 as discussed above. Moreover, the projections of Ushida and Kudo are positioned radially outwardly of drain L in Kudo and the slot 51 of Ushida and thus teach away from the claimed drainage ditch relative to which the claimed barrier (alleged as corresponding to the secondary recovery system 256 of Novak '181) is positioned radially outwardly.

Applicant also submits that the cited portions of Fukami fail to disclose or teach the deficiencies of the cited portions of Novak '181. For example, Applicant submits that the cited portions of Fukami are silent as to a substrate table comprising a barrier configured to collect liquid escaping from the localized area, the barrier surrounding and spaced apart from the substrate. For example, there is no indication that the "dividing wall" of Fukami is spaced apart from the substrate, and/or that the substrate table of Fukami comprises the "dividing wall".

Additionally, the cited portions of Fukami do not appear to provide any teaching regarding the location or arrangement of its "pipe" (except to state that it is "for recovering liquid from within this dividing wall"). Indeed, the other "pipes" to recover liquid referred to in Fukami appear to be suspended above the substrate, such as pipes for discharge 24a and 29a. Thus, the cited portions of Fukami do not appear to be properly combinable with the cited portions of Novak '181 which discloses an entirely different arrangement, namely a second recovery system 256 in the substrate table.

Therefore, for at least the above reasons, the rejections of claims 1, 19 and 28 should be withdrawn. Claims 2-4, 7-9, 12, 15-18, 20-23, 25, 27, 29, 30, 32 and 34-36 depend from claims 1, 19 and 28 respectively, and are patentable for at least the same

reasons provided above related to claims 1, 19 and 28 respectively, and for the additional features recited therein. As a result, Applicant respectfully submits that the rejection under 35 U.S.C. §103(a) of claims 1-4, 7-9, 12, 15-23, 25, 27-30, 32 and 34-36 in view of Novak '181 and either Ushida, Kudo or Fukami should be withdrawn and the claims be allowed.

Claim 5 was rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Novak '181 and Ushida in view of either U.S. Patent Application Publication No. 2002/0020821 to Van Santen et al. ("Van Santen"), U.S. Patent Application Publication No. 2006/0023182 to Novak et al. ("Novak '182") or U.S. Patent No. 6,952,253 to Lof et al ("Lof"). Applicant traverses this rejection.

Claim 5 depends from claim 1. As discussed above, the cited portions of Novak '181 and Ushida fail to disclose or render obvious each and every feature of claim 1, from which claim 5 depends.

Further, even assuming *arguendo* that the cited portions of Novak '181 and Ushida are properly combinable with the cited portions of Van Santen, Novak '182 and/or Lof (which Applicant does not concede), Applicant submits that the cited portions of Van Santen, Novak '182, and Lof do not overcome the shortcomings of the cited portions of Novak '181. For example, none of the cited portions of Van Santen, Novak '182 or Lof make any disclosure or teaching of a barrier surrounding and spaced apart from the substrate and comprising a projection which projects out above an upper surface of the substrate table.

Therefore, for at least the above reasons, Applicant submits that a *prima facie* case of obviousness has not been established and that the cited portions of Novak '181 Ushida, Van Santen, Novak '182, Lof, or a proper combination thereof fail to disclose or render obvious each and every feature recited by claim 1. Claim 5 depends from claim 1 and is patentable for at least the same reasons provided above related to claim 1, and for the additional features recited therein. As a result, Applicant respectfully submits that the rejection under 35 U.S.C. §103(a) of claim 5 over Novak '181 and Ushida in view of either Van Santen, Novak '182 or Lof should be withdrawn and the claim be allowed.

CONCLUSION

All matters having been addressed and in view of the foregoing, Applicant respectfully requests reconsideration of this application and the immediate allowance of all pending claims.

Applicant's representative remains ready to assist the Examiner in any way to facilitate and expedite the prosecution of this matter. If any point remains in issue which the Examiner feels may be best resolved through a personal or telephone interview, please contact the undersigned at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

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